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Department of Toxic Substances Control

Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

Arnold Schwarzenegger
Governor

December 23, 2004

Mr. J. Russell Pitto
Chairman
Simeon Properties
655 Montgomery Street, Suite 1190
San Francisco, California 94111

Mr. Brian Spiller
General Manger Environmental, Services and Engineering
Astra Zeneca
1800 Concord Pike FOP3
P.O. Box 15437
Wilmington, Delaware 19850-5437

Dear Mr. Pitto and Mr. Spiller:

The Department of Toxic Substances Control (DTSC) has completed its review of the air monitoring portion of the Remedial Design Details Addendum for the Habitat Enhancement Area, Subunit 1, Meade Street Operable Unit and subsequent letters (also referred to as the Campus Bay/Zeneca and former Stauffer Chemical Site) located at South 49th Street in Richmond, California. Based upon our review, DTSC requests that the following modifications be made to the air monitoring plan:

1. Air Monitoring Sample Analysis:
    a. In addition to the existing suite of chemicals currently being monitored, polychlorinated biphenyls (PCBs) should be added to the monitoring plan as this chemical was previously detected in site soil and in marsh sediment samples. The laboratory analytical method proposed must be able to achieve detection limits less than action levels.
    b. The current air monitoring plan for pesticides includes the four conventional pesticides DDT, DDD, DDE, and toxaphene. Other chlorinated pesticides such as aldrin, chlordanes, dieldrine, mirex, etc, have been detected at the site. Therefore, the monitoring program needs to be expanded to include additional pesticides to determine whether they are present, and if they are present in the air whether they are at levels of concern. A collection method (such as PUF cartridges) along with an analytical method (such as TO-4a) that can be used to monitor for

persistent chlorinated pesticides should be proposed.

c. The analysis of VOC samples needs to be enhanced to include the additional VOCs that have been identified in groundwater and soil in the marsh area. Currently, only two VOCs, chlorobenzene and tetrachlorethene are being monitored for. Action levels for these additional chemicals will need to be calculated. For chemicals that are currently being monitored by the California Air Resources Board, Bay Area ambient levels may be factored into action levels.

2. Calculation of Action Levels: Please clarify the basis for the action level of 30 part per billion (0.042 mg/m^3) for hydrogen sulfide. Was this value risk-based or based upon bay area ambient values?

3. Monitoring Stations:
   a. An additional monitoring station that includes analysis of air samples for total suspended particulates, hydrogen sulfide, metals, volatile organic compounds and PCBs should replace the current PDR located at the southwestern corner of the site. The purpose of this station is to monitor upwind conditions when the prevailing winds are from San Francisco Bay, and to monitor conditions between the site and the Marina Bay community if wind directions change.
   b. Real-time air monitoring should be conducted between the various marsh and freshwater lagoon excavation locations and the San Francisco Bay Trail. This may be conducted on a regular basis by site personnel or monitors may be located along the San Francisco Bay Trail. As the potential for exposure exists during excavation activities to recreational users, real-time air monitoring for total particulates, hydrogen sulfide and volatile organic compounds needs to be conducted.
   c. Please specify the Interscan 400 series model that is being used to monitor for hydrogen sulfide.
   d. Real-time air monitoring for VOCs, total dust and hydrogen sulfide should be conducted in the area where the excavated marsh material will be treated with granular lime.
   e. The current air monitoring stations should be revised as follows due to the change in remediation activities:
      - Air monitoring station #4 should be switched with the 49th Street north PM10 monitor to enhance perimeter monitoring.
      - The 49th Street north PM10 monitor should be relocated to a location to the north of the current monitoring station #4 to prevent damage by truck traffic and to conduct PM10 monitoring during the lime treatment of the excavated marsh material.
      - Air monitoring station #3 should be relocated to the north of the Lower Freshwater Lagoon. Real-time air monitoring for hydrogen sulfide, total dust, and VOCs should also be conducted during the excavation of the freshwater lagoons.

4. Please specify the operational hours of the community air monitoring stations.

5. The revised plan should include a diagram specifying the location of all air monitoring stations and a table indicating the chemical(s) being monitored and the type of monitor(s) being used at each station.

6. The meteorological station used to determine wind direction is located on top of Building 240. Due to its location, wind direction is not readily apparent to persons at the site; therefore a wind sock(s) should be placed on the site that is visible to persons working in the marsh area and to persons monitoring the loading of the marsh material from the stockpile. This information is necessary so that persons conducting real-time air monitoring are aware of which monitors represent upwind and downwind locations.

7. The real-time data collected by site personnel should be posted daily on the Campus Bay web site. If action levels are exceeded during the work day, the specific measures taken to address the problem and subsequent monitor readings should also be included.

DTSC thanks CSV for considering our previous comments and for updating the air monitoring tables found on the Campus Bay web site.

If you have any questions regarding this letter, please contact me at (510) 540-3843 or Lynn Nakashima of my staff at (510) 540-3839.

Sincerely,

Barbara J. Cook

Barbara J. Cook, P.E., Chief
Northern California – Coastal Cleanup
Operations Branch

cc: Mr. B.B. Blevins
Director
Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

Mr. Bruce Wolfe
Executive Officer
San Francisco Bay
Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, California 94612

Mr. Rick Brausch
Assistant Secretary
California Environmental Protection Agency
P.O. Box 2815
Sacramento, California 95812-2815

Mr. Neil Ziemba
IRG Assumptions, LLC
165 North Main Street
Sebastopol, California 95472